

EXHIBIT 21

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Page 1

1
2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE EASTERN DISTRICT OF VIRGINIA
4 ALEXANDRIA DIVISION

5 UNITED STATES,) 1:23-cv-00108-LMB-JFA
6 et al.,)
7)
8 Plaintiffs,)
9)
10 vs.)
11)
12 GOOGLE LLC,)
13)
14 Defendants.)
15)

16 - HIGHLY CONFIDENTIAL -

17 VIDEOTAPED 30(b)(6) DEPOSITION OF

18 UNITED STATES DEPARTMENT OF VETERANS AFFAIRS

19 through the testimony of

20 KOBY SMITH

21 August 31, 2023

22 4:09 p.m.

Reported by: Bonnie L. Russo

Job No. CS6074125

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	Page 2		Page 4
1	Videotaped 30(b)(6 Deposition of United States	1	I N D E X
2	Department of Veterans Affairs through the	2	EXAMINATION OF KOBY SOUTH
3	testimony of Koby South held at:	3	BY MS. MORGAN
4		4	
5		5	
6	Paul Weiss Rifkind Wharton & Garrison, LLP	6	
7	2001 K Street, N.W.	7	EXHIBITS
8	Washington, D.C.	8	(NONE.)
9		9	
10		10	
11		11	
12		12	
13		13	
14		14	
15		15	
16		16	
17		17	
18	Pursuant to Notice, when were present on behalf	18	
19	of the respective parties:	19	
20		20	
21		21	
22		22	
		Page 3	Page 5
1	APPEARANCES:	1	P R O C E E D I N G S
2	On behalf of the Plaintiffs:	2	(4:09 p.m.)
3	SEAN CARMAN, ESQUIRE	3	
	VICTOR LIU, ESQUIRE	4	THE VIDEOGRAPHER: We are going on
4	ALVIN CHU, ESQUIRE	5	the record at 4:09 p.m. on August 31, 2023.
5	KATHERINE E. CLEMONS, ESQUIRE	6	This is Media Unit 1 of the
6	UNITED STATES DEPARTMENT OF JUSTICE	7	video-recorded deposition of Mr. Koby South in
7	450 Fifth Street, N.W., Suite 700	8	the matter of United States, et al., versus
8	Washington, D.C. 20530	9	Google LLC filed in the United States District
9	sean.carman@usdoj.gov	10	Court, Eastern District of Virginia, Alexandria
10	victor.liu@usdoj.gov	11	Division, Case No. 1:23-cv-00108-LMB-JFA.
11	alvin.chu@usdoj.gov	12	My name is Orson Braithwaite
12	katherine.clemons@usdoj.gov	13	representing Veritext Legal Solutions, and I am
13	On behalf of the Defendant:	14	the videographer. The court reporter is Bonnie
14	ERIN J. MORGAN, ESQUIRE	15	Russo from the firm Veritext Legal Solutions.
15	PAUL, WEISS, RIFKIND,	16	Counsel will now state their
16	WHARTON & GARRISON, LLP	17	appearances and affiliations for the record.
17	1285 Avenue of the Americas	18	MS. MORGAN: I'm Erin Morgan. I'm
18	New York, New York 10019	19	from the law firm Paul Weiss, and we represent
19	ejmorgan@paulweiss.com	20	Google. I am here with my two colleagues,
20	-and-	21	Heather Milligan and Annelise Corriveau.
21	HEATHER MILLIGAN, ESQUIRE	22	MR. CARMAN: Sean Carman for the
22	ANNELISE CORRIVEAU, ESQUIRE		
	MARTHA L. GOODMAN, ESQUIRE (Via Remote)		
	PAUL, WEISS, RIFKIND,		
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	2001 K Street, N.W.		
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	mgoodman@paulweiss.com		
	Also Present:		
	Orson Braithwaite, Videographer		
	Laura Reass, Department of Veterans Affairs		

2 (Pages 2 - 5)

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Page 22	Page 24
<p>1 contract is not buying that paid media," are 2 you referring to the District Communications 3 Group buying paid media from Google? 4 A. Yes. 5 Q. Okay. And does the District 6 Communications Group invoice the Office of 7 Public Health within the Department of Veterans 8 Affairs for the purchase of paid media from 9 Google?</p> <p>10 MR. CARMAN: Objection. Form. 11 THE WITNESS: I would assume, yes. 12 BY MS. MORGAN: 13 Q. And does the Office of Public Health 14 within the Department of Veterans Affairs pay 15 the District Communications Group for the paid 16 media purchases that the District 17 Communications Group makes from Google in 18 connection with the Airborne Hazards and Open 19 Burn Pit Registry campaign? 20 MR. CARMAN: Object to form. 21 THE WITNESS: I lost you on that 22 one.</p>	<p>1 BY MS. MORGAN: 2 Q. Does the District Communications 3 Group ever transfer funds directly to Google -- 4 MR. CARMAN: Objection -- 5 BY MS. MORGAN: 6 Q. -- for purchases of paid media? 7 MR. CARMAN: Objection to form and 8 calls for a legal conclusion. 9 THE WITNESS: Yeah. I think that -- 10 I would say can you -- the way you asked it, 11 no. 12 BY MS. MORGAN: 13 Q. Does the District Communications 14 Group -- you testified that District 15 Communications -- or, sorry. That the Office 16 of Public Health transfers funds to the 17 District Communications Group. 18 Do you remember that? 19 A. Yes. 20 Q. Okay. What did you understand 21 "transfer of funds" to mean when you answered 22 that question?</p>
Page 23	Page 25
<p>1 BY MS. MORGAN: 2 Q. Does the Office of Public Health pay 3 Direct Communications Group -- 4 A. District. 5 Q. Sorry. District Communications 6 Group for paid media purchases that the 7 District Communications Group makes from Google 8 in connection with the Airborne Hazards and 9 Open Burn Pit Registry campaign? 10 A. I wouldn't categorize it that way. 11 They are not paying them for it. It's a 12 transfer of funds in that it's being passed 13 through -- it's being passed through the 14 contractor to whatever ad tech platform the ads 15 are being purchased from. You're not paying 16 the District Communications Group with the paid 17 media dollars. You're passing it through. 18 Q. Does the Office of Public Health 19 transfer funds to the District Communications 20 Group for purchases of paid media from Google? 21 MR. CARMAN: Object to form. 22 THE WITNESS: Yes.</p>	<p>1 A. They are moving it from one place to 2 another place. 3 Q. Does the Office of Public Health 4 transfer funds or move funds from the Office of 5 Public Health into Google with no middleman? 6 A. No. 7 MR. CARMAN: I meant to object to 8 the form to that last question. Sorry. 9 BY MS. MORGAN: 10 Q. In your preparation did you prepare 11 to testify about the Veterans Health 12 Administration Recruitment Marketing and 13 Advertising campaign? 14 A. Yes. 15 Q. What office within the VA is in 16 charge of that campaign? 17 A. I think it's VHA workforce 18 management. 19 Q. Who did you talk to in preparing to 20 testify about that campaign? 21 A. Darren Sherrard. 22 Q. Who is Darren Sherrard?</p>

7 (Pages 22 - 25)

HIGHLY CONFIDENTIAL

<p>1 A. I don't know his exact title. He is 2 a project program manager for workforce 3 recruiting.</p> <p>4 Q. Is he the contracting officer for 5 that campaign?</p> <p>6 A. No.</p> <p>7 Q. Did you talk to the contracting 8 officer for that campaign?</p> <p>9 A. I'm not sure it was the exact 10 contracting officer for that campaign.</p> <p>11 Q. Did you talk to anyone besides 12 Darren Sherrard.</p> <p>13 A. There were two other people on that 14 call. I don't actually remember their names.</p> <p>15 Q. Are you familiar with Aptive 16 Resources LLC?</p> <p>17 A. Yes.</p> <p>18 Q. What is Aptive Resources LLC?</p> <p>19 A. They are a service, disabled 20 veteran-owned, small business, woman-owned, 21 small business that provides boutique strategic 22 communication products and services to</p>	<p>Page 26</p> <p>1 Resources purchase media to support the 2 Veterans Health Administration Recruitment 3 Marketing and Advertising Campaign?</p> <p>4 MR. CARMAN: Object to form and 5 foundation.</p> <p>6 THE WITNESS: I would say again 7 under that contract the government is 8 authorizing Aptive Resources to securitize 9 advertisements in the pursuit of recruiting 10 hard-to-find, hard to -- hard-to-recruit 11 healthcare professionals at the direction of 12 the United States Government.</p> <p>13 BY MS. MORGAN:</p> <p>14 Q. Does Aptive Resources secure -- 15 secure or purchase media from Google in 16 connection with the Veterans Health 17 Administration Recruitment Marketing and 18 Advertising Campaign?</p> <p>19 MR. CARMAN: Objection. Form. 20 Foundation.</p> <p>21 THE WITNESS: I would say that 22 Aptive secures paid advertising for the United</p>	
<p>1 government agencies and corporations and stuff.</p> <p>2 Q. Does Aptive Resources have a -- a 3 contract with the VHA in connection with the 4 Veterans Health Administration Recruitment 5 Marketing and Advertising Campaign?</p> <p>6 A. Yes.</p> <p>7 Q. What does that contract cover? What 8 services are provided under that contract?</p> <p>9 A. It's a broad contract to secure and 10 recruit hard-to-reach healthcare professionals 11 in a nutshell.</p> <p>12 Q. Does that contract -- is that a 13 firm-fixed-price contract?</p> <p>14 A. Yes.</p> <p>15 Q. Under that contract is Aptive 16 Resources LLC responsible for developing media 17 plans for the Veterans Health Administration 18 Recruitment Marketing and Advertising Campaign?</p> <p>19 MR. CARMAN: Objection to form.</p> <p>20 THE WITNESS: Yes.</p> <p>21 BY MS. MORGAN:</p> <p>22 Q. Under that contract does Aptive</p>	<p>Page 27</p> <p>1 States Government under the bounds of the 2 contract.</p> <p>3 BY MS. MORGAN:</p> <p>4 Q. Do you know if it secures paid 5 advertising under that contract from Google?</p> <p>6 MR. CARMAN: Objection. Form. 7 Foundation.</p> <p>8 BY MS. MORGAN:</p> <p>9 A. As I recall, I think it does.</p> <p>10 Q. Do you know what Google products it 11 uses? Does it use any Google ad tech products?</p> <p>12 A. I don't recall that the -- the 13 information I collected cited any specific 14 Google ad tech products that were used.</p> <p>15 Q. And are you able to name any Google 16 ad tech products that are used in connection 17 with the Veterans Health Administration 18 Recruitment Marketing and Advertising Campaign?</p> <p>19 MR. CARMAN: Objection. Form.</p> <p>20 THE WITNESS: I am not.</p> <p>21 BY MS. MORGAN:</p> <p>22 Q. Did you ask anyone what Google</p>	<p>Page 29</p>

8 (Pages 26 - 29)

HIGHLY CONFIDENTIAL

Page 30	Page 32
<p>1 products were used in connection with that 2 campaign as you were preparing to testify on 3 behalf of the Department of Veterans Affairs?</p> <p>4 A. Again, we asked specifically about 5 ad tech products, not Google ad tech products. 6 And once again it was -- in this instance 7 Darren Sherrard referenced making decisions on 8 how their paid media is authorized and spent 9 based on the populations that they are pursuing 10 as opposed to the processes or products that 11 are used.</p> <p>12 So what's going to work best for me 13 to recruit a bunch of nurses? Is it going to 14 be LinkedIn, or is it going to be banner and 15 badge ads? So they're more concerned about the 16 results as opposed to the mechanism for getting 17 there, which is pretty similar for most 18 campaigns of this nature at the Department of 19 Veterans Affairs. We are looking for results 20 and performance as opposed to dictating exactly 21 what ad tech products an agency must use.</p> <p>22 Q. So am I correct in understanding</p>	<p>1 Health, and the ad tech providers that -- from 2 whom the District Communications Group secures 3 media.</p> <p>4 Do you remember those questions that 5 we were just going through a few minutes ago?</p> <p>6 A. Uh-huh. Yes.</p> <p>7 Q. Do you know whether Aptive Resources 8 buys any kind of media space from Google in 9 connection with the Veterans Health 10 Administration Recruitment Marketing and 11 Advertising Campaign?</p> <p>12 MR. CARMAN: Object to form and 13 foundation.</p> <p>14 THE WITNESS: Again, I wouldn't 15 characterize it as Aptive buying advertising 16 products directly. They are -- again, they are 17 operating under the approval of the United 18 States Government and the paid media plan and 19 purchasing or securing advertising at the 20 direction of the VA program manager.</p> <p>21 BY MS. MORGAN:</p> <p>22 Q. Do you know whether media is</p>
<p>1 that in your conversations preparing to testify 2 about the Veterans Health Administration 3 Recruitment Marketing and Advertising Campaign, 4 no one identified for you any specific ad tech 5 that was used in connection with that campaign?</p> <p>6 MR. CARMAN: Object to form.</p> <p>7 THE WITNESS: Unless you would 8 consider something like LinkedIn or Facebook or 9 Twitter an ad tech product, which was 10 identified specifically to this.</p> <p>11 BY MS. MORGAN:</p> <p>12 Q. Would you consider those to be ad 13 tech products?</p> <p>14 MR. CARMAN: Object to form.</p> <p>15 THE WITNESS: I mean, I think an 16 argument can be made since you're buying them 17 directly from there.</p> <p>18 BY MS. MORGAN:</p> <p>19 Q. And when we were talking about the 20 District Communications Group, we talked about 21 the transfer of funds between the District 22 Communications Group, the Office of Public</p>	<p>1 purchased from Google in connection with the 2 Veterans Health Administration Recruitment 3 Marketing and Advertising Campaign?</p> <p>4 MR. CARMAN: Object to form and 5 foundation.</p> <p>6 THE WITNESS: As I recall, yes.</p> <p>7 BY MS. MORGAN:</p> <p>8 Q. From where at Google is that media 9 purchased?</p> <p>10 MR. CARMAN: Object to form and 11 foundation.</p> <p>12 THE WITNESS: I don't think that was 13 specified.</p> <p>14 BY MS. MORGAN:</p> <p>15 Q. Are there particular tools at Google 16 that are used to purchase media for the 17 Veterans Health Administration Recruitment 18 Marketing and Advertising Campaign?</p> <p>19 MR. CARMAN: Object to form and 20 foundation.</p> <p>21 THE WITNESS: I don't recall that 22 being discussed.</p>

9 (Pages 30 - 33)

HIGHLY CONFIDENTIAL

Page 34	Page 36
1 BY MS. MORGAN:	1 A. Okay. Yes.
2 Q. If media is bought from Google in	2 Q. Is there a shorter way that we can
3 connection with the Veterans Health	3 agree to refer to that campaign that will make
4 Administration Recruitment Marketing and	4 sense to you?
5 Advertising Campaign, does the Veterans Health	5 A. ChooseVA will be acceptable.
6 Administration pay for that media through a	6 Q. Okay. I'm going to refer to -- I'm
7 middleman?	7 going to say ChooseVA, but I'm going to be
8 MR. CARMAN: Object to form and	8 referring to that whole description I just gave
9 foundation. Calls for a legal conclusion.	9 you. Do you understand?
10 THE WITNESS: I would not call it a	10 A. I do.
11 middleman. Advertising is being secured	11 Q. What did you do to prepare to
12 through a contract.	12 testify about ChooseVA?
13 BY MS. MORGAN:	13 A. I talked to Gary Tallman and Lyndon
14 Q. Does the Office of Public -- of	14 Johnson in the Office of Public and
15 the -- sorry.	15 Intergovernmental Affairs.
16 Does the Office of the VHA transfer	16 Q. Is the ChooseVA campaign with --
17 or move funds into Google without a middleman?	17 does the ChooseVA campaign fall under the
18 MR. CARMAN: Objection. Form.	18 umbrella of the Office of Public --
19 Foundation. Calls for a legal conclusion.	19 A. And Intragovernmental Affairs.
20 THE WITNESS: Money for paid media	20 Q. Office of Public what?
21 is moved through a representative of the United	21 A. And Intragovernmental Affairs.
22 States Government under the bounds of a	22 Q. Intergovernmental Affairs?
Page 35	Page 37
1 legally-binding contract.	1 A. I think it's intra.
2 BY MS. MORGAN:	2 Q. Intra.
3 Q. Is the representative of the United	3 Does the ChooseVA campaign fall
4 States Government you are referring to Aptive	4 within that office?
5 Resources LLC?	5 A. Yes.
6 A. Yes, in this specific instance.	6 Q. Did you talk to the contracting
7 Q. Yes, I am asking specifically about	7 officer for that campaign?
8 this campaign.	8 A. I don't recall that she was the
9 A. Workhorse, yeah.	9 contracting -- I talked to a contracting
10 Q. Did you prepare to testify today	10 officer. I don't recall that she was the exact
11 about the ChooseVA outreach and strategic	11 contracting officer for that campaign. I -- I
12 communications campaigns to expand awareness of	12 think she was.
13 VA resources and support recruitment and	13 Q. Okay. And what's her name?
14 employee retention efforts?	14 A. Lindi, L-I-N-D-I, Johnson. I don't
15 A. Yes.	15 recall her exact name. I -- yeah.
16 Q. Will you -- will you --	16 Q. Okay. Does Aptive Resources do any
17 A. Can you say that again.	17 work in connection with the ChooseVA campaign?
18 Q. Did you prepare to testify today	18 A. Yes.
19 about the ChooseVA outreach and strategic	19 Q. What does Aptive Resources do in
20 communications campaigns to expand awareness of	20 connection with the ChooseVA campaign?
21 VA resources and support recruitment and	21 A. They provide strategic communication
22 employee retention efforts?	22 services for that office.

10 (Pages 34 - 37)

HIGHLY CONFIDENTIAL

Page 38	Page 40
1 Q. Did you review the contract under 2 which those services are provided?	1 recalled. You said Google specifically. Not 2 that they were aware of.
3 A. I don't remember or recall that 4 contract.	3 BY MS. MORGAN:
5 Q. Do you know if it's a firm, fixed -- 6 firm-fixed-price contract?	4 Q. Did they recall any other ad tech 5 tools that are used to secure paid media for 6 the ChooseVA outreach?
7 A. It's highly likely that it's a 8 firm-fixed-price contract.	7 MR. CARMAN: Object to form and 8 foundation.
9 Q. When you say "it's highly likely," 10 do you just mean that you don't specifically 11 remember?	9 THE WITNESS: I think they 10 referenced again Facebook or Instagram or 11 things like that.
12 MR. CARMAN: Object. 13 Mischaracterizes his testimony.	12 BY MS. MORGAN:
14 THE WITNESS: It is.	13 Q. Do you know whether the ChooseVA 14 outreach campaign uses banner ads?
15 BY MS. MORGAN:	15 A. I think they do.
16 Q. In connection with the ChooseVA 17 campaign, does Aptive Resources develop media 18 plans for that campaign?	16 Q. Do you know whether the Veterans 17 Health Administration Recruitment Marketing and 18 Advertising campaign uses banner ads?
19 A. Yes.	19 A. I think occasionally they do.
20 Q. Does Aptive Resources purchase media 21 for that campaign?	20 Q. Why do you say occasionally for that 21 one?
22 A. Aptive Resources secures paid media	22 A. I think they do, yes.
Page 39	Page 41
1 advertisements under the guidance and approval 2 of the program managers for that program.	1 Q. For -- do you know whether the 2 Airborne Hazards and Open Burn Pit Registry 3 campaign uses banner ads?
3 Q. Does Aptive --	4 A. I don't recall.
4 MR. CARMAN: For the record I wanted 5 to object to the last question. Sorry.	5 Q. Do you know where the banner ads 6 that are used in the Veterans Health 7 Administration Recruitment Marketing and 8 Advertising campaign appear?
6 BY MS. MORGAN:	9 A. Specifically?
7 Q. Does Aptive Resources secure paid 8 media for the ChooseVA campaign from Google?	10 Q. Or generally. Just what do you know 11 about it based on your prep?
9 MR. CARMAN: Again, object to form 10 and foundation to the last two questions.	12 A. Banner badge ads. Again, this was 13 workforce management.
11 THE WITNESS: Under the guidance and 12 under the boundaries of the contract and at the 13 direction of the program manager and the 14 contracting officer's representative, yes.	14 Q. Veterans Health Administration 15 Recruitment Marketing --
15 BY MS. MORGAN:	16 A. Yeah.
16 Q. What -- does it use any -- does 17 it -- does it secure paid media through any 18 Google ad tech tools?	17 Q. -- and Advertising campaign?
19 MR. CARMAN: Object to form and 20 foundation.	18 A. As Darren mentioned and I mentioned 19 at the beginning of talking about him, they 20 follow audiences, and so stating specifically 21 where a banner ad would appear would be, from 22 my perspective, almost impossible.

11 (Pages 38 - 41)

HIGHLY CONFIDENTIAL

Page 54	Page 56
<p>1 BY MS. MORGAN:</p> <p>2 Q. Well, I am just trying to understand 3 why you're -- why you're referencing American 4 Express. But let me ask the question a 5 different way.</p> <p>6 A. Because you're asking about transfer 7 of funds.</p> <p>8 MR. CARMAN: I don't think there is 9 a pending question.</p> <p>10 BY MS. MORGAN:</p> <p>11 Q. I am -- what I am trying to 12 understand is whether funds are transferred -- 13 well, let me ask this: Does Google invoice -- 14 send an invoice to the Office of Mental Health 15 and Suicide Prevention for paid media purchased 16 for suicide prevention campaigns?</p> <p>17 MR. CARMAN: Object to form.</p> <p>18 THE WITNESS: No.</p> <p>19 BY MS. MORGAN:</p> <p>20 Q. Does the Office of Mental Health and 21 Suicide Prevention pay for services that are 22 never invoiced?</p>	<p>1 understand me to mean the full description I 2 just read. Can we agree on that?</p> <p>3 A. Yes.</p> <p>4 Q. What did you do to prepare to 5 testify about the Lethal Means campaigns?</p> <p>6 A. I spoke to a representative from the 7 suicide prevention program.</p> <p>8 Q. Who did you speak to?</p> <p>9 A. Dr. Todd Burnett and Juliana 10 Hallows.</p> <p>11 Q. Are those the same two people you 12 spoke to in connection with the suicide 13 prevention campaigns?</p> <p>14 A. Yes.</p> <p>15 Q. Are the Lethal Means campaigns also 16 under the umbrella of the Office of Mental 17 Health and Suicide Prevention?</p> <p>18 A. Yes.</p> <p>19 Q. Are you familiar with an entity 20 called Trilogy Federal, LLC?</p> <p>21 A. To a limited extent.</p> <p>22 Q. What is Trilogy Federal based on</p>
Page 55	Page 57
<p>1 MR. CARMAN: Object to form.</p> <p>2 THE WITNESS: Can you repeat that.</p> <p>3 BY MS. MORGAN:</p> <p>4 Q. Yeah. Would the Office of Mental 5 Health and Suicide Prevention ever just 6 transfer money to a company if it did not 7 receive an invoice from that company?</p> <p>8 MR. CARMAN: Object to form.</p> <p>9 THE WITNESS: I mean, that's a very 10 hypothetical. I'm going to -- no. No.</p> <p>11 BY MS. MORGAN:</p> <p>12 Q. Did you prepare to testify today 13 about campaigns to promote use of secure 14 storage for firearms to prevent suicide 15 including but not limited to Keep It Secure and 16 Lethal Means Safety?</p> <p>17 A. Yes.</p> <p>18 Q. If I refer to that group of 19 campaigns as firearm --</p> <p>20 A. Lethal Means.</p> <p>21 Q. Lethal Means. Okay. I will refer 22 to that as Lethal Means, and you will</p>	<p>1 your understanding?</p> <p>2 A. A service, disabled veteran-owned 3 small business that provides strategic 4 communication service.</p> <p>5 Q. Does Trilogy Federal provide 6 strategic communication services in connection 7 with the Lethal Means campaigns?</p> <p>8 A. Yes.</p> <p>9 Q. Is there a contract between Trilogy 10 Federal and the Office of Mental Health and 11 Suicide Prevention that covers that, those 12 campaigns?</p> <p>13 A. Currently?</p> <p>14 Q. Yes.</p> <p>15 A. Not that I'm aware of.</p> <p>16 Q. Was there a prior contract between 17 Trilogy Federal and the Office of Mental Health 18 and Suicide Prevention that covered Lethal 19 Means campaigns?</p> <p>20 A. Yes.</p> <p>21 Q. Do you know when that contract -- if 22 that contract has expired?</p>

15 (Pages 54 - 57)

HIGHLY CONFIDENTIAL

Page 58	Page 60
1 A. I do not.	1 MR. CARMAN: Same objection.
2 Q. Do you know why there is no longer a 3 contract in place between Trilogy Federal and 4 Lethal Means?	2 THE WITNESS: As I recall, that 3 contract, yes, authorized that entity to 4 purchase paid media under the direction of the 5 government.
5 MR. CARMAN: Object to form.	6 BY MS. MORGAN:
6 BY MS. MORGAN:	7 Q. Do you know if banner ads were 8 included in the paid media purchased for the 9 Lethal Means campaigns?
7 Q. Do you know why there is no longer a 8 contract in place between Trilogy Federal and 9 the Office of Mental Health and Suicide 10 Prevention in connection with the lethal means 11 campaign?	10 MR. CARMAN: Object to form.
12 A. That program is looking to 13 consolidate and refine how it does contracting.	11 THE WITNESS: To the -- I think so. 12 I'm not entirely sure. I think they were.
14 Q. Does that mean they're using a 15 different contractor?	13 BY MS. MORGAN:
16 A. Or attempting to create a new 17 contract.	14 Q. Do you know where those banner ads 15 appeared?
18 Q. Did you review the preexisting 19 contract between Trilogy Federal and the Office 20 of Mental Health and Suicide Prevention that 21 covers the Lethal Means campaigns?	16 A. This would have been similar to all 17 the other campaigns we have spoken of. They 18 would have, you know, targeted at-risk veterans 19 and would have looked for mechanisms to get 20 those ads in places where they thought they 21 would do the most good, you know.
22 MR. CARMAN: Object to form.	22 Q. Does Trilogy Federal invoice the
Page 59	Page 61
1 THE WITNESS: Yes.	1 Office of Mental Health and Suicide Prevention 2 for paid media that is purchased in connection 3 with the Lethal Means campaigns?
2 BY MS. MORGAN:	4 MR. CARMAN: Object to form.
3 Q. Do you know whether that was a 4 firm-fixed-price contract?	5 THE WITNESS: Yes.
5 A. Yes.	6 BY MS. MORGAN:
6 Q. Do you know whether that contract 7 directed Trilogy Federal to develop media plans 8 for the Lethal Means campaigns?	7 Q. Does the Office of Mental Health and 8 Suicide Prevention pay those invoices?
9 A. As I recall, yes.	9 MR. CARMAN: Object to form.
10 Q. Do you know whether that contract 11 directed Trilogy Federal to purchase media to 12 support the campaign -- the Lethal Means 13 campaigns?	10 THE WITNESS: Yes.
14 MR. CARMAN: Object to form.	11 BY MS. MORGAN:
15 THE WITNESS: Can you repeat the 16 question.	12 Q. Do you know if Trilogy Federal uses 13 Google to secure paid media for the Lethal 14 Means campaigns?
17 BY MS. MORGAN:	15 MR. CARMAN: Object to form.
18 Q. Yeah. Do you know whether the 19 contract between Trilogy Federal and the Office 20 of Mental Health and Suicide Prevention 21 directed Trilogy Federal to secure paid media 22 for the Lethal Means campaigns?	16 THE WITNESS: I do not.
	17 BY MS. MORGAN:
	18 Q. Did you ask anyone if the Lethal 19 Means campaigns -- if media -- paid media is 20 secured through Google in connection with the 21 Lethal Means campaigns?
	22 MR. CARMAN: Object to form.

16 (Pages 58 - 61)

HIGHLY CONFIDENTIAL

<p style="text-align: right;">Page 62</p> <p>1 THE WITNESS: We asked specifically 2 about ad tech products, and again, they did not 3 have a strong understanding of the ad tech 4 product but mentioned that they give direction 5 on goals and what they would like to achieve. 6 And the contractor then uses that to 7 create recommendations that everyone agrees 8 upon, and then those ads are placed in places 9 that will achieve those goals.</p> <p>10 BY MS. MORGAN:</p> <p>11 Q. When you spoke to people about the 12 Lethal Means campaigns, did anyone name any ad 13 tech product to you that is used to purchase 14 paid media for the Lethal Means campaign?</p> <p>15 MR. CARMAN: Object to form.</p> <p>16 THE WITNESS: Again, they would have 17 referenced maybe some platforms that could also 18 be, you know, argued as being ad tech 19 platforms. So I would say possibly.</p> <p>20 BY MS. MORGAN:</p> <p>21 Q. Do you know whether DV360 is used to 22 purchase paid media for the Lethal Means</p>	<p style="text-align: right;">Page 64</p> <p>1 A. That was the Veterans Crisis Line, 2 Suicide Prevention Line, there was a couple 3 others.</p> <p>4 Q. Yeah. It was Veterans Crisis Line, 5 be there more than ever before, reach and 6 prevent.</p> <p>7 A. I think they were likely used at 8 some point during the length of all of those 9 efforts.</p> <p>10 Q. Do you know whether banner ads are 11 still used today in connection with any of 12 those campaigns?</p> <p>13 A. Most of those campaigns have been 14 sunsetted for other things, like, lethal means 15 -- other than the crisis line, and I think, you 16 know, what they use varies. I think they do 17 use some banner ads.</p> <p>18 Be there, reach, prevents, no longer 19 exists.</p> <p>20 Q. Did you do any preparation to 21 testify about general mental health and suicide 22 prevention awareness in education outreach</p>
<p style="text-align: right;">Page 63</p> <p>1 campaign?</p> <p>2 MR. CARMAN: Object to form.</p> <p>3 THE WITNESS: I would have to look 4 at an invoice. I -- I would feel semiconfident 5 saying that it likely is.</p> <p>6 BY MS. MORGAN:</p> <p>7 Q. Do you know if Google issues an 8 invoice to the Office of Mental Health and 9 Suicide Prevention for any, media that is 10 secured for the lethal means campaign using 11 Google products?</p> <p>12 MR. CARMAN: Object to form.</p> <p>13 THE WITNESS: Google would not 14 invoice the United States Government that I am 15 aware of, and I am not aware of the Department 16 of Veterans Affairs having a contract directly 17 with Google.</p> <p>18 BY MS. MORGAN:</p> <p>19 Q. We talked earlier about the suicide 20 prevention campaign. Do you know whether 21 banner ads are a part of the suicide prevention 22 campaign?</p>	<p style="text-align: right;">Page 65</p> <p>1 support services campaign, to reduce the stigma 2 associated with mental health conditions, 3 increase mental health literacy and connect 4 veterans with VA mental healthcare?</p> <p>5 A. No.</p> <p>6 Q. Did you not prepare to testify on 7 that subject because that is within the scope 8 of your ordinary course of business in your 9 job?</p> <p>10 A. Yes, ma'am.</p> <p>11 Q. You testified in your 30(b)(1) 12 deposition that Reingold is a contractor that 13 provides communication services for those 14 campaigns.</p> <p>15 Do you remember that?</p> <p>16 A. Yes, ma'am.</p> <p>17 Q. Does Reingold invoice -- well, does 18 Reingold provide media planning services for 19 those campaigns?</p> <p>20 A. Reingold creates media plans, along 21 with the -- the VA employees that are then, you 22 know, deliberated and discussed and then</p>

17 (Pages 62 - 65)

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Page 66	Page 68
1 eventually approved.	1 a contract between Reingold and the Office of
2 Q. Does Reingold secure a paid media	2 Mental Health and Suicide Prevention for the
3 for the general mental health campaigns?	3 services provided by Reingold in connection
4 MR. CARMAN: Objection. Form.	4 with general mental health campaigns?
5 Foundation.	5 A. Didn't we ask that at the beginning?
6 BY MS. MORGAN:	6 Is there a contract between Reingold and the
7 Q. Do you understand what I mean when I	7 Office of Mental Health and Suicide Prevention
8 say "general mental health campaign"?	8 for general mental health outreach and support
9 A. Yes, the big long title you	9 services basically?
10 referenced earlier, yes, ma'am.	10 Q. Yes.
11 Reingold, under the direction of the	11 A. Yes, there is a contract between
12 government, within the boundaries of the	12 them.
13 contract, secures paid media in accordance with	13 Q. Is that -- is that a
14 an approved paid media plan at the direction of	14 firm-fixed-price contract?
15 the government.	15 A. That is a firm-fixed-price contract.
16 Q. Does Reingold invoice the Office of	16 Q. All right. Sitting here today, do
17 Mental Health and Suicide Prevention for media	17 you know any Google products besides DV360 for
18 that it secures in connection with general	18 which -- that have been used -- sorry.
19 mental health campaigns?	19 Sitting here today, do you know any
20 MR. CARMAN: Objection to form.	20 Google products besides DV360 that have been
21 THE WITNESS: Yes.	21 used to secure paid media for any Department of
22 BY MS. MORGAN:	22 Veterans Affairs' campaign that we just
Page 67	Page 69
1 Q. Does the Office of Mental Health and	1 discussed?
2 Suicide Prevention pay those invoices?	2 MR. CARMAN: Object to form.
3 MR. CARMAN: Object to form.	3 THE WITNESS: I am not aware of any,
4 THE WITNESS: Yes.	4 no.
5 BY MS. MORGAN:	5 BY MS. MORGAN:
6 Q. Does Reingold use any Google	6 Q. Is it your understanding that the
7 products to secure paid media for general	7 Department of Veterans Affairs has paid fees
8 mental health campaigns?	8 for ad tech services provided by Google through
9 MR. CARMAN: Object to form.	9 DV360?
10 THE WITNESS: To the best of my	10 MR. CARMAN: Object to form.
11 knowledge, I think they use DV360.	11 THE WITNESS: I have, in a limited
12 BY MS. MORGAN:	12 capacity, I have seen invoices that include
13 Q. Does Google send an invoice directly	13 fees related to using DV360.
14 to the Office of Mental Health and Suicide	14 BY MS. MORGAN:
15 Prevention for the use of DV360 in securing	15 Q. Who sent those invoices?
16 paid media for mental health campaigns?	16 A. Those invoices were submitted to the
17 MR. CARMAN: Object to form.	17 Office of Mental Health and Suicide Prevention,
18 THE WITNESS: No. The Office of	18 by a contractor by Reingold and I think by
19 Mental Health and Suicide Prevention does not	19 Reingold.
20 receive invoices from Google.	20 Q. Any other contractors?
21 BY MS. MORGAN:	21 A. It was likely that Aptive and
22 Q. Is the contract between -- is there	22 District Communications Group would have

18 (Pages 66 - 69)

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Page 70	Page 72
1 included listings for fees of DV360, but I 2 can't be positive. 3 Q. What is the amount of fees that the 4 Department of Veterans Affairs has paid to 5 Google for use of DV360 or other Google 6 products to secure paid media? 7 MR. CARMAN: Object to form. 8 BY MS. MORGAN: 9 Q. Sorry, let me strike the question. 10 What is the amount of -- do you know 11 what "open web display advertising" is? 12 A. I would be hazarding a guess. I 13 would not be able to give you an exact industry 14 standard definition. 15 Q. When did you first hear the term 16 "open web display advertising"? 17 MR. CARMAN: Objection to form. 18 Also, I want to object that I believe this is 19 outside of the scope of the deposition topics. 20 MS. MORGAN: The topics cover the 21 manners in which the Department of Veterans 22 Affairs secures paid media.	1 Affairs have an understanding of what open web 2 display advertising is? 3 MR. CARMAN: Object to form. 4 THE WITNESS: I think probably not. 5 BY MS. MORGAN: 6 Q. What is the amount of fees that the 7 Department of Veterans Affairs has paid for use 8 of DV360 or other Google products to secure 9 paid media? 10 A. I don't think that was a data point 11 that was asked to be collected and that was -- 12 and during what period of time and under what 13 contracts. I have no idea. 14 Q. Do you know that the Department of 15 Veterans Affairs is alleging money damages in 16 this case for the fees that it has paid for use 17 of DV360 or other Google products to secure 18 paid media? 19 MR. CARMAN: I object to the form of 20 the question. The United States is making that 21 allegation in this case. 22 BY MS. MORGAN:
Page 71	Page 73
1 The Department of Veterans Affairs 2 has alleged that it is damaged by paid media 3 related to open web display advertising. 4 MR. CARMAN: Okay. I made my 5 objection. You can answer the question if you 6 understand it. 7 THE WITNESS: I -- I -- 8 MR. CARMAN: If you know. 9 THE WITNESS: Yeah, I could not give 10 you an exact day or date or time. I mean, a 11 lot of it will just run across on Reddit. 12 BY MS. MORGAN: 13 Q. Do you think you ran across it on 14 Reddit? 15 A. Probably not. 16 Q. Do you think you knew what open web 17 display advertising was before this year? 18 A. No. 19 Q. In your 30(b)(1) testimony, you said 20 that you were -- you did not know what open web 21 display advertising was. 22 Does the Department of Veterans	1 Q. Do you know that the United States 2 is alleging that the Department of Veterans 3 Affairs is entitled to money damages for fees 4 that the Department of Veterans Affairs has 5 paid for use of DV360 or other Google products 6 to secure paid media? 7 MR. CARMAN: Object to form. 8 THE WITNESS: I am aware that the 9 United States Government is trying to return -- 10 recapture, get refunded fees. 11 BY MS. MORGAN: 12 Q. As the representative of the 13 Department of Veterans Affairs, sitting here 14 today, you have no assessment of how much the 15 fees are that the department has paid for use 16 of DV360 or other Google products to secure 17 paid media; is that right? 18 MR. CARMAN: Object to the form of 19 the question and mischaracterizes the 20 testimony. 21 I also want to object that this is 22 outside the scope of the deposition topics.

19 (Pages 70 - 73)

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Page 74	Page 76
1 MS. MORGAN: We can address that off 2 the record. I don't think that's right. 3 BY MS. MORGAN: 4 Q. We talked in your 30(b)(1) 5 deposition about when you learned about the 6 lawsuit that Google filed in the -- sorry, 7 strike that. 8 We talked in your 30(b)(1) 9 deposition about when you personally learned 10 about the lawsuit the Department of Justice 11 filed against Google in the Eastern District of 12 Virginia. 13 Do you remember that? 14 A. Yes. 15 Q. I want to talk to you in your role 16 as the representative of the Department of 17 Veterans Affairs about when the Department of 18 Veterans Affairs learned of that lawsuit. 19 Do you know when that was? 20 A. February of this year. 21 Q. At the time that the Department of 22 Veterans Affairs learned that the Department of	1 again and then you can make your objection 2 again. 3 BY MS. MORGAN: 4 Q. Do you know if anyone from the 5 Department of Justice spoke to anyone inside 6 the Department of Veterans Affairs in advance 7 of filing the lawsuit against Google in the 8 Eastern District of Virginia? 9 MR. CARMAN: Objection. Calls -- 10 objection. Because it seeks communications 11 between attorneys at the Department of Justice 12 and Veterans Administration and others, so I 13 instruct you not to answer to the extent your 14 answer would reveal communications between 15 lawyers at the Department of Justice and 16 individuals at the VA. 17 BY MS. MORGAN: 18 Q. Were you prepared to testify today 19 about your involvement in -- the Department of 20 Veterans Affairs' involvement in communications 21 -- sorry, scratch that. 22 Were you prepared to testify today
Page 75	Page 77
1 Justice had filed a lawsuit in the Eastern 2 District of Virginia against Google, had that 3 lawsuit already been filed? 4 A. I don't know the specific date when 5 the lawsuit was filed. 6 Q. But in your prep for this deposition 7 as the representative of the VA, you understand 8 that they learned -- that the VA learned of the 9 lawsuit in February? 10 A. Correct. 11 Q. Do you know if anyone from the 12 Department of Justice spoke to anyone inside 13 the Department of Veterans Affairs before 14 filing the lawsuit? 15 MR. CARMAN: So I object to the 16 extent this calls for attorney-client 17 communication and instruct you in your answer 18 not to disclose any conversations between 19 lawyers from the Department of Justice and the 20 Veterans Administration. 21 MS. MORGAN: I was not done asking 22 the question, so I'm going to say the question	1 about the Department of Veterans Affairs, the 2 circumstances that led to the Department of 3 Veterans Affairs to be involved in the lawsuit, 4 including any efforts that the Department of 5 Veterans Affairs undertook to investigate the 6 Department of Justice's claims? 7 Were you prepared to testify about 8 how the Department of Veterans Affairs got 9 involved in the lawsuit today? 10 MR. CARMAN: Objection as to form. 11 THE WITNESS: I don't -- I don't 12 understand the question. 13 MS MORGAN: It's a topic that was 14 agreed upon in this notice, that the Department 15 of Veterans Affairs would testify about the 16 circumstances that led the department to be 17 involved in this lawsuit, and I understand you 18 now to be saying that he can't testify on that 19 topic because it's privileged. Am I right 20 about that? 21 MR. CARMAN: No, that is not -- that 22 is not correct. He testified as to when the

20 (Pages 74 - 77)

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Page 78	Page 80
1 Veterans Administration learned of the lawsuit 2 and that was an answer to your question about 3 the circumstances that led VA to be involved in 4 the lawsuit. 5 BY MS. MORGAN: 6 Q. Tell me everything you know that is 7 not from a lawyer, about the circumstances that 8 led the Department of Veterans Affairs to be 9 involved in this lawsuit. 10 MR. CARMAN: Okay. So I will have 11 -- object again to attorney-client privilege. 12 You can answer. 13 THE WITNESS: I do not know anything 14 other than what I have discussed with -- with 15 lawyers related to the Department of Veterans 16 Affairs being involved in this lawsuit. 17 BY MS. MORGAN: 18 Q. Is it the Department of Justice's 19 position that the only responsive information 20 to noticed Topic No. 30 is the date on which 21 the Department of Veterans Affairs learned of 22 the lawsuit?	1 dates of such conversation between DOJ and VA 2 occurred, and the people involved in those 3 conversations, but we will fall back on our 4 objection or we will reiterate our objection 5 about not disclosing the substance of those 6 conversations or any attorney work product. 7 And then with respect to Topic 26 in 8 the notice, I wanted to put on the record that 9 we have -- our understanding is, we have agreed 10 with Google that questioning along this topic 11 will be subject to our standing objection, that 12 this topic is not an appropriate topic for a 13 30(b)(6) inquiry, because the United States is 14 going to rely on expert testimony to 15 demonstrate these facts. 16 MS. MORGAN: Understood. And 17 Google, I think not surprisingly, does not 18 agree with the Department of Justice's 19 position, reserves all rights in that regard, 20 but we understand how you want to proceed. 21 MR. CARMAN: Thank you. 22 BY MS. MORGAN:
Page 79	Page 81
1 MR. CARMAN: Before we answer that 2 question, can I confer with my colleague. 3 MS. MORGAN: Sure. Let's go off the 4 record. 5 MR. CARMAN: Okay. 6 THE VIDEOGRAPHER: The time is 7 p.m. We are off the record. 8 (A short recess was taken.) 9 THE VIDEOGRAPHER: The time is 10 p.m. This begins Unit 2. We are on the 11 record. 12 MR. CARMAN: So following -- 13 following our break, I wanted to clarify two 14 things. The first is that with regard to 15 questions to Mr. South about -- sorry. 16 This is -- Topic 30, the 17 circumstances that led you, capital Y-O-U, to 18 be involved in the lawsuit including any 19 efforts you undertook to investigate your 20 claim. 21 The United States is taking the 22 position that Mr. South can testify about the	1 Q. Mr. South, you testified that the 2 Department of Veterans Affairs learned of the 3 Department of Justice's lawsuit against Google 4 in February of 2023. 5 Do you remember that? 6 A. Yes. 7 Q. Do you know who was involved in that 8 conversation from the Department of Veterans 9 Affairs? 10 A. I don't know about the initial 11 communication that was made. There was a 12 meeting established later that involved the 13 Department of Justice and, you know, the 14 Department of Veteran Affairs. 15 It was during that same month, 16 February 2023. I hadn't -- unfortunately, had 17 some notes on this and I misplaced them, so 18 some of the names I have are just going to be 19 first names. 20 From the VA, it was definitely 21 Laura. And Jason Fergosa, F-E-R-G-O-S-A, I 22 think. From the Department of Justice, I think

21 (Pages 78 - 81)

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<p style="text-align: right;">Page 90</p> <p>1 the record that Google was informed last night 2 by the Department of Justice that there were 3 several thousand documents of Mr. South's that 4 were not produced in advance of this 5 deposition.</p> <p>6 So we reserve the right to reopen 7 the deposition should that become necessary 8 based on the documents we reviewed.</p> <p>9 I will also reserve the right to 10 reopen the deposition as necessary on the 11 topics on which Mr. South is not prepared to 12 testify, including certain campaigns that were 13 listed earlier in the deposition and whether 14 Google products were used in connection with 15 other campaigns.</p> <p>16 And I am going to -- and also, I'll 17 reserve rights on the Court's determination 18 about standing privilege objection.</p> <p>19 In other words, I will reserve the 20 balance of my time for after the department 21 asks any questions if it wants to do that.</p> <p>22 MR. CARMAN: Okay. Can we take a</p>	<p style="text-align: right;">Page 92</p> <p>1 CERTIFICATE OF NOTARY PUBLIC 2 I, Bonnie L. Russo, the officer before 3 whom the foregoing deposition was taken, do 4 hereby certify that the witness whose testimony 5 appears in the foregoing deposition was duly 6 sworn by me; that the testimony of said witness 7 was taken by me in shorthand and thereafter 8 reduced to computerized transcription under my 9 direction; that said deposition is a true 10 record of the testimony given by said witness; 11 that I am neither counsel for, related to, nor 12 employed by any of the parties to the action in 13 which this deposition was taken; and further, 14 that I am not a relative or employee of any 15 attorney or counsel employed by the parties hereto, nor financially or otherwise interested 16 in the outcome of the action.</p> <p>17</p> <p>18</p> <p>19</p> <p>20 Notary Public in and for 21 the District of Columbia</p> <p>22 My Commission expires: August 14, 2025.</p>																																												
<p style="text-align: right;">Page 91</p> <p>1 brief -- just a brief break?</p> <p>2 MS. MORGAN: Of course.</p> <p>3 MR. CARMAN: And then we will 4 resume. I don't think we even have to leave 5 the room. But we can go off the record.</p> <p>6 THE VIDEOGRAPHER: The time is 7 p.m. Off the record.</p> <p>8 (A short recess was taken.)</p> <p>9 THE VIDEOGRAPHER: The time is 10 p.m. On the record.</p> <p>11 MR. CARMAN: Okay. We just want to 12 say for the record that we don't agree that 13 there is a record in this deposition that 14 demonstrates that Mr. South was not prepared to 15 testify on any topic in the deposition notice, 16 and with that, we have no further questions.</p> <p>17 MS. MORGAN: Great. I think we can 18 close the record.</p> <p>19 THE VIDEOGRAPHER: The time is 20 p.m. Off the record.</p> <p>21 (Whereupon, the proceeding was 22 concluded at 5:44 p.m.)</p>	<p style="text-align: right;">Page 93</p> <p>1 ACKNOWLEDGMENT OF DEPONENT 2 I, KODY SOUTH, do hereby certify that I have 3 read the foregoing transcript of my testimony 4 taken on 8/31/23, and further certify that it 5 is a true and accurate record of my testimony 6 (with the exception of the corrections listed 7 below):</p> <table style="width: 100%; border-collapse: collapse;"> <tr><td style="width: 10%;">8</td><td style="width: 10%;">Page</td><td style="width: 10%;">Line</td><td style="width: 70%;">Correction</td></tr> <tr><td>9</td><td>—</td><td>—</td><td>_____</td></tr> <tr><td>10</td><td>—</td><td>—</td><td>_____</td></tr> <tr><td>11</td><td>—</td><td>—</td><td>_____</td></tr> <tr><td>12</td><td>—</td><td>—</td><td>_____</td></tr> <tr><td>13</td><td>—</td><td>—</td><td>_____</td></tr> <tr><td>14</td><td>—</td><td>—</td><td>_____</td></tr> <tr><td>15</td><td>—</td><td>—</td><td>_____</td></tr> <tr><td>16</td><td>—</td><td>—</td><td>_____</td></tr> <tr><td>17</td><td>—</td><td>—</td><td>_____</td></tr> <tr><td>18</td><td>—</td><td>—</td><td>_____</td></tr> </table> <p style="text-align: right;">KODY SOUTH</p> <p>19 SUBSCRIBED AND SWORN TO BEFORE ME 20 THIS ____ DAY OF _____, 2023. 21</p> <p>22 (NOTARY PUBLIC) _____ MY COMMISSION EXPIRES: Job No. CS6074125</p>	8	Page	Line	Correction	9	—	—	_____	10	—	—	_____	11	—	—	_____	12	—	—	_____	13	—	—	_____	14	—	—	_____	15	—	—	_____	16	—	—	_____	17	—	—	_____	18	—	—	_____
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24 (Pages 90 - 93)